

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS'  
CONCUSSION INJURY LITIGATION

Kevin Turner and Shawn Wooden, on behalf of themselves  
and others similarly situated,

Plaintiffs,

v.

National Football League and NFL Properties LLC,  
successor-in-interest to NFL Properties, Inc.,

Defendants.

No. 2:12-md-02323-AB

MDL No. 2323

**Hon. Anita B. Brody**

CIVIL ACTION NO: 2:14-cv-  
00029-AB

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**DECLARATION OF CLAIMS ADMINISTRATOR, ORRAN L. BROWN, SR.**

ORRAN L. BROWN, SR. declares, pursuant to 28 U.S.C. § 1746, based upon his personal knowledge, information and belief, the following:

1. I am an adult over twenty-one years of age. I am the Chairman and a founding partner of BrownGreer PLC ("BrownGreer"), located at 250 Rocketts Way, Richmond, Virginia 23231. I have personal knowledge of the facts set forth herein and if called and sworn as a witness, I could and would testify competently to all matters contained herein.

2. In connection with the class action settlement ("Settlement") in this case, the Court appointed BrownGreer as the Claims Administrator, tasked with, *inter alia*, administering the registration and claims processes and providing supplemental notices to the Class Members as to various administrative matters and deadlines, as directed by the Court and the Settling

Parties. As part of my role, I am responsible for managing communications with Class Members, including Retired NFL Football Players.

3. On March 14, 2017, BrownGreer received an email from someone purporting to be a Retired NFL Football Player who wants to remain anonymous, detailing a telephone call he had received from an individual who identified himself as Andrew Schneider from NFL Case Consulting and who made representations about the Settlement and his role. BrownGreer forwarded that email to counsel for the Settling Parties. A true and correct copy of that email is attached hereto as Exhibit 1. I have redacted the email address on the attached, in light of the stated desire of the sender to remain anonymous.

4. On March 16, 2017, BrownGreer received an email from the same email address as that on Exhibit 1, again requesting anonymity. The March 16th email similarly reported a call from NFL Case Consulting and identified several individuals by name, including the caller, Drecy Lefrance. The sender reported additional representations on the call about the Settlement and that the caller knew his Social Security number. BrownGreer forwarded that email to counsel for the Settling Parties. A true and correct copy of that email is attached hereto as Exhibit 2. I have redacted the email address on the attached.

5. On March 17, 2017, BrownGreer received a cover email from a Retired NFL Football Player (under the alias of "John Smith") with an attached letter sent to that Class Member by Jim McCabe, Chief Executive Officer of NFL Case Consulting, LLC, located at 1855 Griffin Road, Suite B354, Dania Beach, Florida. In the cover email, the Class Member expressed his desire to remain anonymous. He also crossed out his name and address on the letter. BrownGreer forwarded that cover email and letter to counsel for the Settling Parties. Attached hereto as Exhibit 3 is a true and correct copy of the cover email and letter, with the Class Member's identity redacted on both documents. The email address on the March 17th

email that is part of Exhibit 3 is different from the email address that appeared on Exhibits 1 and 2.

6. On March 21, 2017, BrownGreer received from counsel for the NFL Parties a copy of the same letter from Jim McCabe of NFL Case Consulting, LLC that is Exhibit 3 hereto, but addressed to a different Retired NFL Football Player. BrownGreer forwarded that letter to Co-Lead Class Counsel. A true and correct copy of that letter is attached hereto as Exhibit 4. I have redacted the name and address of the Class Member on the attached.

7. On March 21, 2017, BrownGreer received a telephone call from a represented Class Member who alerted us to having received a letter from NFL Case Consulting.

8. On March 22, 2017, BrownGreer received five telephone calls from Retired NFL Football Players reporting that they, too, had received letters from NFL Case Consulting similar to the letters attached hereto as Exhibits 3 and 4.

9. On March 24, 2017, BrownGreer received telephone calls from two unrepresented Retired NFL Football Players who have registered in the Program. Both callers reported they had received a letter from NFL Case Consulting like the letter attached as Exhibits 3 and 4.

10. From March 10, 2017 through March 15, 2017, five Class Members were registered for the Settlement using the “nflcaseconsulting.com” domain, specifically, by aschneider@nflcaseconsulting.com and jfingerhut@nflcaseconsulting.com.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 27<sup>th</sup> day of March, 2017.

A handwritten signature in blue ink, appearing to read "Orran L. Brown, Sr.", is written over a horizontal line.

Orran L. Brown, Sr.

# Exhibit 1

**From:** [REDACTED]  
**Sent:** Tuesday, March 14, 2017 10:27 PM  
**To:** NFL Claims Administrator  
**Subject:** NFL PLAYER WHISTLEBLOWER

Hello,

I am a retired NFL player that wishes to remain anonymous. I recently got a call from a very arrogant guy from this website, [www.nflcaseconsulting.com](http://www.nflcaseconsulting.com) his name Andrew Schneider, 954-271-1267. He wanted me to sign an agreement that he said was the official NFL legal team and approved by the judge. He was extremely rude. This company sounds like a scam operation. I am a proud member of the NFLPA and wish to protect my fellow members from predators like this guy. I found a connection to a website [www.justicefunds.com](http://www.justicefunds.com) but do not know who is behind it. Andrew said that he can get me \$5 million by going to his own doctor. This company needs to be shut down.

This message is intended only for the use of the Addressee and may contain information that is privileged and confidential. If you are not the intended recipient, you are hereby notified that any dissemination of this communication is strictly prohibited. If you have received this communication in error, please erase all copies of the message and its attachments and notify us immediately.

# Exhibit 2

**From:** [REDACTED]  
**To:** [NFL Claims Administrator](#)  
**Subject:** Fwd: DMCA INFRIDGEMET  
**Date:** Thursday, March 16, 2017 7:18:22 AM

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I am a former NFL Player and wish to remain anonymous. I was contacted by a company called NFL Case Consulting. They claim to be part of the NFL. [www.nflcaseconsulting.com](http://www.nflcaseconsulting.com). They want to sign me for a 15% contingency and their contract says NFL Case Consulting, 600 Brickell Avenue, #1900, Miami FL, 33131 Craig Sienema CEO. Their literature has NFL all over it appearing to be the NFL. Got a call from a shady guy named Drecy Lefrance [954-988-5290](tel:954-988-5290) [dlafrance@nflcasxeconsulting.com](mailto:dlafrance@nflcasxeconsulting.com) saying he's representing the NFL. The marketing guy behind this got a list of retired players with SS #'s. He knew my social. Jim McCabe CEO of Liberty Settlement in Fort Lauderdale is behind the scam I found out.

These people are scamming retired NFL players and needs to be stopped before more players sign their contract that says NFL on it.

Good luck.

Anonymous

# Exhibit 3



**From:** John Smith [REDACTED]  
**Sent:** Friday, March 17, 2017 5:41 PM  
**To:** NFL Claims Administrator; [notices@nfl.com](mailto:notices@nfl.com); [clue@wsvn.com](mailto:clue@wsvn.com)  
**Subject:** Retired NFL Player Whistleblower

This company called me and some of my retired buddies down here in Florida representing themselves as calling from the NFL's case management department. They also have our social security number and date of birth. They're telling us that in order to register for the NFL concussion money they will send me a documents that needs to be signed. They told me that they will pay for my doctor diagnosis and travel up to \$10,000 and if I don't sign with them I won't get a settlement up to \$5 million per player they told me. The person that called me was named K.J. said he and his dudes call brain damaged players like myself all day long and on the weekends getting them to sign away 15% of their award by scamming them into thinking if they don't sign, their is no award and they are working for the NFL. Without signing they won't get their settlement and won't be in the class action. I found that to be a lie.

I got a letter that shows the scam operation is running out of Dania Beach Florida and the documents say NFL Case Consulting 600 Brickell Ave, #1900 Miami FL and a guy named Craig Sienema and Jim McCabe as CEO. When I called KJ back a guy answered the phone saying Liberty Settlement Solutions and not NFL but when I got tansferred to KJ he answered the phone by saying, this is KJ from NFLCC.

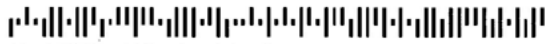
These guys should be arrest for fraud. How many innocent NFL retired players have they already scammed and who signed up with them. These snakes are prying on the sick and unfortunate retired players and should be stopped.

I wish to remain anonymous.





**NFLCASE**  
Consulting LLC



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Dear

Did you know that you or your family may qualify for a portion of the NFL settlement?

If you played in the NFL, you may be entitled to settlement compensation of up to **\$5 Million Dollars**, but there is an urgent deadline approaching. Failure to sign up before this deadline means you will miss the opportunity to be part of this billion-dollar settlement forever!

**Even if you do not have symptoms, you may still qualify, but you must sign up before the deadline so call us right away!**

The registration and steps involved with filing an NFL concussion settlement claim is very complicated, but we are experts in claims management and will be with you every step of the way.

Call our team of NFL Settlement Experts at 1-855-285-4154 today to find out what you need to know and what you need to do before the deadline has passed.

Sincerely,

John E. Ebe

Jim McCabe  
Chief Executive Officer

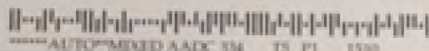
1855 Griffin Road • Suite B354 • Dania Beach, Florida 33004

**1-855-285-4154**

# Exhibit 4



**NFLCASE**  
Consulting LLC



Dear

Did you know that you or your family may qualify for a portion of the NFL settlement?

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Call our team of NFL Settlement Experts at 1-855-285-4154 today to find out what you need to know and what you need to do before the deadline has passed.

Sincerely,

J. A. Allen

Jim McCabe  
Chief Executive Officer

1855 Griffin Road • Suite B354 • Dania Beach, Florida 33004

1-855-285-4154